

**Worksheet**  
**Determination of NEPA Adequacy (DNA)**  
**U.S. Department of the Interior**  
**Bureau of Land Management**

OFFICE: Rock Springs Field Office

TRACKING NUMBER: DOI-BLM-WY-D040-2016-0158-DNA

CASEFILE/PROJECT NUMBER: WYW 162037

PROPOSED ACTION TITLE/TYPE: Alkali Gulch Unit #11-17D Application for Permit to Drill (APD) (WY-040-FY16-008) approval. The proposal is to approve the proposed Alkali Gulch Unit #11-17D APD directly adjacent to the approved Alkali Gulch Unit #14-17D well pad.

LOCATION/LEGAL DESCRIPTION: Section 17 T13N R100W.

APPLICANT (if any): QEP Energy Company

**A. Description of the Proposed Action and any applicable stipulations and mitigation measures**

QEP Energy Company (QEP) requests approval of the Alkali Gulch Unit #11-17D APD, which would approve one gas well and associated well pad and would be adjacently located and slightly overlapping with the approved Alkali Gulch Unit #14-17D well pad which was authorized under WY-040-EA11-176. Total proposed surface disturbance is 3.3 acres.

**Standard Stipulations:**

Should any paleontological resources be discovered during the life of the project, the following stipulation will apply:

- The Lease Holder (LH) shall immediately notify the BLM Authorized Officer (AO) of any paleontological resources discovered as a result of operations under this authorization. The LH shall suspend all activities within 100 feet of the vicinity of such discovery until notified to proceed by the AO and shall protect the discovery from damage or looting. The LH may not be required to suspend all operations if activities can be adjusted to avoid further impacts to a discovered locality or be continued elsewhere. The AO will evaluate, or will have evaluated, such discoveries as soon as possible, but not later than 10 working days after being notified. Appropriate measures to mitigate adverse effects to significant paleontological resources will be determined by the AO after consulting with the LH. Within 10 days, the LH will either be allowed to continue construction through the site, or will be given the choice of either (1) following the AO's instructions for stabilizing the fossil resource in place and avoiding further

disturbance to the fossil resources or (2) following the AO's instructions for mitigating impacts to the fossil resource prior to continuing construction through the project area.

- Any cultural resource (historic or prehistoric or object or feature) discovered by the LH, or any person working on his behalf, shall be immediately reported to the AO. The LH shall suspend all operations within 100 feet of the immediate area of such discovery. If the discovery is suspected to include human remains then all operations within 300 feet of the discovery shall be suspended. In either case, work within the vicinity of the discovery may not proceed until written authorization to proceed is issued by the AO. An evaluation of the discovery will be made by the AO to determine appropriate actions to prevent the loss of significant cultural or scientific values. The LH will be responsible for the cost of the evaluation and any decision as to proper mitigation measures will be made by the AO after consulting with the LH.

#### **Mitigation Measures:**

- **Spot Check/Post Construction Paleo-Inspection:** A certified paleontologist who meets or exceeds the qualification standards recommended by the Secretary of the Interior will be on site at all times during construction and shall inspect any bedrock exposed during surface disturbing activities (such as the construction of the reserve pit, well pad, access road, etc). Any paleontological materials located during construction will be reported to the AO. Procedures for determining significance and/or effect will be established at that time. Cost of any further paleontological work will be borne by the LH.
- To protect wintering big game populations, a timing restriction on surface disturbing and disruptive activities would be implemented from November 15 to April 30.

#### **B. Land Use Plan (LUP) Conformance**

LUP Name: Green River Resource Management Plan and Record of Decision  
Date Approved: August 8, 1997

Other Document: Record of Decision and Approved Resource Management Plan Amendments for the Rocky Mountain Region, Including the Greater Sage-Grouse Sub-Regions of Lewistown, North Dakota, Northwest Colorado, and Wyoming.  
Date Approved: September 21, 2015

The proposed action is in conformance with the applicable LUP because it is specifically provided for in the following LUP decisions:

*Oil and Gas Management*, page 12: "To provide for leasing, exploration and development of oil and gas, while protecting other values."

#### **C. Identify applicable National Environmental Policy Act (NEPA) documents and other related documents that cover the proposed action.**

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*Environmental Assessment for the Alkali Gulch Unit #14-17D (WY-040-EA11-176, BLM 2012); Decision Record [DR] and Finding of No Significant Impact [FONSI], Alkali Gulch Unit #14-17D EA (signed March 20, 2012).*

**D. NEPA Adequacy Criteria**

**1. Is the new proposed action a feature of, or essentially similar to, an alternative analyzed in the existing NEPA document(s)? Is the project within the same analysis area, or if the project location is different, are the geographic and resource conditions sufficiently similar to those analyzed in the existing NEPA document(s)? If there are differences, can you explain why they are not substantial?**

Yes, the proposal is substantially similar to the proposed action analyzed in WY-040-EA11-176. This EA documented the impacts associated with the construction of the Alkali Gulch Unit #14-17D well, well pad and access road in the project area. The proposed Alkali Gulch Unit #11-17D would be adjacently located and slightly overlapping with the approved Alkali Gulch Unit #14-17D well pad. The new proposed action only includes a proposed well and well pad since the access road already exists. The geographic and resource conditions are the same as in the original analysis in WY-040-EA11-176.

**2. Is the range of alternatives analyzed in the existing NEPA document(s) appropriate with respect to the new proposed action, given current environmental concerns, interests, and resource values?**

Yes, the range of alternatives in the Alkali Gulch Unit #11-17D proposal are identical to the range of alternatives analyzed in WY-040-EA11-176. There have been no changes in environmental concerns, interests, or resource values within the project area. The range of alternatives analyzed in WY-040-EA11-176 include the proposed action and the no action alternative, which are appropriate for the current proposal as it included development of a well pad and associated infrastructure.

**3. Is the existing analysis valid in light of any new information or circumstances (such as, rangeland health standard assessment, recent endangered species listings, updated lists of BLM-sensitive species)? Can you reasonably conclude that new information and new circumstances would not substantially change the analysis of the new proposed action?**

Yes, analysis within WY-040-EA11-176 completed in March 2012 covers identical and similar actions as the current proposal in the same project area. Additional surface disturbance will occur however, no new information concerning rangeland health, endangered or special status species or any other new information or concerns have come to light that would substantially change the analysis of the new proposed action.

**4. Are the direct, indirect, and cumulative effects that would result from implementation**

**of the new proposed action similar (both quantitatively and qualitatively) to those analyzed in the existing NEPA document?**

Yes the direct, indirect and cumulative effects of the current proposal are similar to those in the proposed action analyzed in WY-040-EA11-176. The new proposal entails an additional 3.3 acres of surface disturbance with similar effects as analyzed in the (adjacent and overlapping) Alkali Gulch Unit #14-17D EA. The new proposal is the same type of project in the same geographic area with similar effects as analyzed in WY-040-EA11-176 and therefore no substantially different direct, indirect, and cumulative effects would be anticipated.

**5. Are the public involvement and interagency review associated with existing NEPA document(s) adequate for the current proposed action?**

Yes. Due to the size and routine nature of the Alkali Gulch Unit #14-17D well pad and facilities, the Environmental Assessment was internally scoped. After this EA was signed, no appeals to this decision were received. The Alkali Gulch #11-17D was internally scoped for these same reasons. The projects are similar in nature and adjacent to each other. No additional public or interagency review was deemed necessary.

**E. Persons/Agencies /BLM Staff Consulted**

**Proposed Action**

<u>Name</u>	<u>Title</u>	<u>Resource/Agency Represented</u>
Brandon Teppo	Natural Resource Specialist (NRS)	BLM
Phillip Blundell	NEPA Coordinator	BLM
Patrick Lionberger	Wildlife Biologist	BLM
Lacey Anderson	Range Management Specialist	BLM
Gene Smith	Cultural and Paleontological Coordinator	BLM
Steve Madden	Recreation Planner	BLM
Jay D'Ewart	Wild Horse Specialist	BLM
Dennis Doncaster	Hydrologist	BLM

**Original EA/Existing NEPA WY-040-EA11-176**

<u>Name</u>	<u>Title</u>	<u>Resource/Agency Represented</u>
Samantha Thurston	Natural Resource Specialist (NRS)	BLM
Nick Kaczor	Wildlife Biologist	BLM
Jonathan Sheeler	Range Management Specialist	BLM
Jaci Wells	Cultural- Archeologist	BLM
Terry DelBene	Cultural- Archeologist	BLM

**Conclusion**

Based on the review documented above, I conclude that this proposal conforms to the applicable land use plan and that the NEPA documentation fully covers the proposed action and constitutes BLM's compliance with the requirements of the NEPA.

Brenda J. Lopez 5-26-2016  
Signature of Project Lead

[Signature]  
Signature of NEPA Coordinator

[Signature] 5/26/2016  
Signature of the Responsible Official: Date

**Note:** The signed Conclusion on this Worksheet is part of an interim step in the BLM's internal decision process and does not constitute an appealable decision. However, the lease, permit, or other authorization based on this DNA is subject to protest or appeal under 43 CFR Part 4 and the program-specific regulations.